REMARKS

1. Claims 1 and 11-14 stand rejected under 35 U.S.C. 102(b) as being anticipated by Kamisaka *et al.* (US 5,708,960).

In an example embodiment of the present invention, Claim 1, as currently amended, recites a method for content synchronization for bulk data transfer in a multimedia network. The method includes, in part, scheduling transmission of bulk data content by pushing that content to a plurality of end node devices, the schedule including identifying a subset of end node devices. As is known to those skilled in the art, content "push" refers to data transmission initiated by the content provider, that is, data "pushed" to a subscriber without that subscriber having requested it specifically. Conversely, content pull refers to data transmission initiated or specifically requested by a subscriber, that is, data "pulled" by the subscriber.

In contrast, Kamisaka teaches a newspaper dispatching system where newspaper data is received at homes which have subscribed to the newspaper. Because a user must initiate reception of newspaper data by first subscribing to the newspaper and obtaining an encryption key, the system of Kamisaka is inherently a content "pull" system. Kamisaka does not teach or suggest "scheduling transmission of bulk data content push to a plurality of end node devices" as claimed in Claim 1.

An example embodiment of the present invention also includes identifying a *subset of end node devices* that are associated with a subset of the bulk data content. This allows a particular promotion to be transmitted to a promotion group that includes diverse types of network devices that may be functionally different (e.g., television set top box and Internet video phones).

Kamisaka teaches a control frame that stores *individual* terminal identification (ID) of a pertinent subscriber (col. 7, lines 1-5). Nowhere does Kamisaka disclose a *subset* of home terminals or subscribers. Thus, Kamisaka does not teach or suggest "identifying a subset of end node devices" as claimed in Claim 1.

Furthermore, Kamisaka's control frame also stores a command for registering the content of the subscriber's contract. A separate data frame stores the newspaper data (i.e., bulk content) in its data field (col. 7, lines 6, 41-47 and FIGs. 4A and 4B). Thus, Kamisaka associates an

individual terminal ID with a command for registering the contents of the contract – both of which are in the control frame. As a result, Kamisaka associates an individual device to control data, not the newspaper data (i.e., bulk content). Kamisaka does not teach or suggest "associating the subset of end node devices with a subset of the bulk data content" as claimed in Claim 1.

Another example embodiment of the present invention discloses scanning the bulk data content push to identify the *subset of bulk data* content push and attempting to selectively receive the identified *subset of bulk data* content push at the subset of end node devices. Kamisaka teaches a receiver that receives the newspaper data which is written into a reception buffer (col. 8, line 59 to col. 9, line 1). If contract information does not agree, data frame (i.e., newspaper content) is later discarded. (col. 9, lines 38-48). Consequently, Kamisaka receives *all* the newspaper data at *every* terminal. Kamisaka does not teach or suggest "attempting to selectively receive the identified subset of bulk data content push at the subset of end node devices during the scheduled transmission" as claimed in Claim 1.

Thus, *there are at least four elements of Applicants' Claim 1 that are not found in Kamisaka.* Because Kamisaka does not teach or suggest each and every claim element as recited in Applicants' presently amended Claim 1, Applicants respectfully submit that the present invention is patentable over Kamisaka. The rejection under 35 U.S.C. 102 should therefore be withdrawn.

2. Claims 2 and 3 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka, in view of Gupta (US 6,577,599). Claims 4 and 8 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka in view of McNeil (US 6,421,706). Claims 5 and 7 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka in view of Miura *et al.* (US 6,483,848). Claim 9 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka, in view of McNeil, and further in view of Kadansky *et al.* (US 6,507,562). Claim 10 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka, in view of McNeil, and further in view of Wada (US 2003/0007481). Claim 15 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka, in view of Gupta, and further in view of Kadansky.

Claim 16 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Kamisaka, in view of Miura, and further in view of Dillon (US 2003/0206554).

Claims 2-5, and 7-16 depend, directly or indirectly, on base Claim 1 and therefore incorporate all of the elements of the independent claim. As explained above, Kamisaka does not disclose multiple elements of Applicants' Claim 1. Therefore, any rejection for obviousness of the dependent claims under 35 U.S.C. 103 in view of Kamisaka and the other references is therefore prima facie deficient.

Applicants thus also respectfully submit that Claims 2-5, and 7-16 are also allowable for at least the same reasons stated above for Claim 1. Accordingly, Applicants respectfully request withdrawal of the various rejections under 35 U.S.C. 103.

CONCLUSION

In view of the above amendments and remarks, it is believed that all claims are in condition for allowance, and it is respectfully requested that the application be passed to issue. If the Examiner feels that a telephone conference would expedite prosecution of this case, the Examiner is invited to call the undersigned.

Respectfully submitted,

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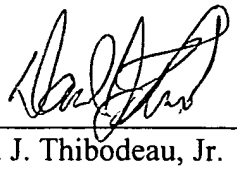
By 

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